Message

From: Ramanauskas, Peter [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6492DDC4240C482B891D9F48B06E17F6-PRAMANAU]

Sent: 6/16/2017 9:02:50 PM

To: Maria Powell (MEJO) [mariapowell@mejo.us]

Subject: RE: Follow up, Re: question about PCB remediation/closure

Flag: Follow up

Hello Maria,

Sorry it has taken me a bit to get back to you. Have been on some travel as of late.

As to your question about the building, EPA has released guidance on precautionary measures and best work practices for conducting repairs or renovations in older buildings which have the potential to contain PCB, mainly in non-liquid building materials which may be present in structures of a certain age. That guidance can be found here https://www.epa.gov/pcbs/steps-safe-renovation-and-repair-activities

I will be happy to contact the Center to make them aware of this guidance and inform them of your concern with respect to the Brassworks building renovation.

Regards, Peter

From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]

Sent: Thursday, June 08, 2017 1:49 PM

To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>

Subject: Re: Follow up, Re: question about PCB remediation/closure

Peter:

Mike's response is very familiar. In February 2012, we and some of our community collaborators asked Mike Schmoller why they hadn't tested for PCBs at Kipp and suggested that they do so (as citizens had since the 90s). He told us, in no uncertain terms, that he had no reason to believe there would be PCBs there. Of course, one month later (March 2012), significant levels of PCBs were found there when they were digging to build the SVE system. You know the rest of the story.

So, we are skeptical of DNR's claims that there are no contaminants inside the Brassworks building when there has been no testing. There was some testing of soils there, and significant levels of PAHs and metals were found (see attached, beginning pg. 12). PCBs (7 aroclors) were tested in 3 locations and all were under detection limits. This seems like far too few samples to rule out PCBs.

The soils will be removed/remediated, but what about the building? Given that the Brassworks building will be used for programs for children run by the Goodman Center, it seems imperative that building materials be tested.

Can you suggest any way that citizens could request that this testing be done, other than asking the DNR (which will say no)?

Thanks, Maria On 6/8/2017 8:01 AM, Maria Powell (MEJO) wrote:

Thanks, Mike.

As you know, brass and other metal foundries commonly involved the use of PCBs.

Anyway, I will assume (unless you say otherwise) that no other contaminants were tested inside the building either (metals, etc) before the art show and public open houses in coming days. http://host.madison.com/wsj/news/local/forge-exhibit-to-meld-art-and-madison-history/article_c72d0acd-85ef-553c-8652-f5f894a9ce00.html

As far as I know, there has been no remediation yet in the building. I hope the artists didn't pound into contaminated materials as they set up their exhibits.

Maria

On 6/7/2017 12:30 PM, Schmoller, Michael R - DNR wrote:

Maria

I do not believe there was interior sampling for PCBs at the Brassworks site. I do not think there was anything in the site history that suggested that PCBs would be present inside the building.

We are committed to service excellence.

Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

R. Michael Schmoller

Phone: 608-275-3303

Michael.schmoller@wisconsin.gov

From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]

Sent: Tuesday, June 06, 2017 2:18 PM

To: Ramanauskas, Peter

Cc: Schmoller, Michael R - DNR

Subject: Follow up, Re: question about PCB remediation/closure

Hello again,

Just a reminder--Mike, I'm hoping you can address my questions below.

Expanding a bit on the 2nd question--can you tell me if any contaminant testing (PCBs or anything else) was done on materials inside the Brassworks building? Right now artists are in there working on sculptures and other art for a public open house this weekend.

Thank you, Maria

On 5/30/2017 8:40 AM, Maria Powell (MEJO) wrote:

Peter--

Thanks--this is helpful.

A few years ago I copied everything in the Goodman file, including the 2005 documents. I didn't see any maps or data on the Goodman PCB soil sampling. Mike, did I miss it--and if so, can you share it?

Thank you for informing the Goodman leaders about proper management of the PCB contaminated materials. On a related note--Mike, will Goodman be expected to test for PCBs in materials in the Brassworks building that they will be refurbishing soon for their center expansion?

Thanks, I appreciate the responses.

Maria

On 5/26/2017 3:38 PM, Ramanauskas, Peter wrote:

Hello Maria,

For old industrial properties, sometimes there is little information available on what PCB sources might have been. Section 2.1.5 of the October 2008 Closure Request that you sent me references the September 2005 PCB soil sampling requested by WDNR and indicates there was an August 2005 report and a September 2005 report attachment submitted. Do you have copies of those? If not, please request the information from Mike Schmoller with WDNR (cc'd here) as I imagine those documents would contain the information on the soil sampling that you are interested in, including information about suspected PCB sources.

As to your question about responsibility for proper management of PCBs should they perform reconstruction/renovation that may affect residually impacted areas, the Goodman Center as the property owner is responsible for proper management of regulated PCB. To that end, we will contact the Goodman Center to inform them of such responsibility.

Thanks, Peter

----Original Message---From: Maria Powell (MEJO)
[mailto:mariapowell@mejo.us]

Sent: Thursday, May 25, 2017 9:26 AM

To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: Re: question about PCB remediation/closure

Peter,

Thank you.

Yes, I know they tested four soil samples for PCBs. As I said below, there are no maps of where they took these four samples and this soil PCB data is not in the files. So we know nothing about where they tested, what they tested, what the detection limits were, etc. There is nothing in any of the reports suggesting that they identified what the sources of PCBs were, where they were, etc.

How can you appropriately assess and remediate a site without knowing the source of the contaminants and how they were used, pathways of release, etc? I believe Wisconsin's NR 700 rules require some of this, but these rules are rampantly ignored at sites in south central Wisconsin. Consequently, we have situations like Madison Kipp--where the PCBs were "discovered" in 2012, after citizens raised questions about them for decades but DNR said they weren't there because they never tested for them. Goodman, of course, has children playing all over it, so the stakes are even higher.

One further question: What entity is responsible to assure that when Goodman does reconstruction inside the building, they handle the PCBs appropriately? The DNR? Goodman? The contractors?

Thanks, Maria On 5/24/2017 2:24 PM, Ramanauskas, Peter wrote:

Hello Ms. Powell,

I did look over the information you provided to Gary & me. Given the low PCB levels detected in the building, it appears that the remedial actions taken were appropriate (i.e. capping of the residual in the original floor by approximately 20 inches of new concrete underlain with gravel and the removal, cleaning, and/or encapsulation/marking of remaining building columns). Although the owner considered the federal PCB cleanup regulations in the actions they took to address the contamination found in the building materials that exceeded 1 mg/kg, because the as-found concentrations of PCB did not exceed 50 mg/kg, they may not have notified U.S. EPA in light of the regulatory language at 40 CFR 761.50(b)(3). I see that WDNR did request the collection of four soil samples for PCB analysis which resulted in non-detects. Sampling is usually biased to suspected source areas, in this case visibly oil stained areas. Various Federal PCB Policies and Guidance documents may be found here: https://www.epa.gov/pcbs/poli cy-and-guidancepolychlorinated-biphenylpcbs

Please let me know if you have additional questions.

Regards, Peter

----Original Message---From: Maria Powell (MEJO)
[mailto:mariapowell@mejo.us]

Sent: Monday, May 22, 2017
8:16 AM
To: Ramanauskas, Peter
<ramanauskas.peter@epa.gov>
Subject: Re: question about
PCB remediation/closure

Hi Peter:

I just heard that the Goodman Center is planning to do some remodeling in the building referred to below—and it reminded me of our exchanges. Any chance to look the information over yet?

Thanks, Maria

On 5/10/2017 9:52 AM, Maria Powell (MEJO) wrote:

FYI, in case you don't already know this, the Goodman Community Center is directly adjacent to Madison Kipp, to the north.

On 5/10/2017 9:39 AM, Maria Powell (MEJO) wrote:

Peter

,

Thank
you-I
appre
ciate
the
respo
nse.
There
's no
parti
cular
rush,
just
get
back

can. Maria

to me when vou

On 5/9/2

017 4:41 PM, Raman auska s, Peter wrote : Н е 1 1 0 Μ S Р 0 W е 1 1 Т h а n k У 0 u f 0 r t h е а d d i t i 0 n а 1 i n f 0 r m а t i 0 n I

W

i 1 1 0 0 i t 0 V е r s o Ι С а n b е t t е r u n d е r s а n d t h е s i е h i s t 0 r У а n d g e t b а c k t 0 о У

u . I n t h е m е а n t i m е , I d i d W а n t t 0 1 e t У u k n 0 W t h а t I W i 1 1 b е 0 u t 0 f t h е o f f i c е t 0

m 0 r r 0 W а n d W i l l r е V i е W t h е i n f 0 r m а t i 0 n У 0 u а t t а С h е d W h е n Ι r е t u r n Т h а n k У

0 u , P e t е r 0 r i g i n а 1 Μ е s s а g e F r 0 m : Μ a r i a P 0 W 1 (M E J $\begin{bmatrix} m \\ \underline{a} \\ \underline{i} \\ \underline{l} \\ \underline{t} \\ \underline{o} \end{bmatrix}$

: | m | a | r | i | a | p | o | W | e | L | L | e | m | e | i | o | v | s | l | s e n t : T u e s d а У м а У 0 9 ,20173:31PMT0:Edelstein

G arya-Dnrvigialriy iEldlellisitlelinlelwiisiclolnisiin igolvixi cc.r а m а n а u S k а s $Peter < rac{r}{a}$

m|a|n|a|u|s|k|a|s| ·|p|e|t|e|r|@|e|p|a| ·|の|o|>|>| の u b つ e c t ・ R e : q u e s t i o n а b 0 u t P C B r e m e d i a t i o n

/ c 1 0 S u r е Т h а n k s G а r У , t h i s i s h е 1 p f u 1 I m s 0 r r --У е s , I m е а n t h е С 1 0 S u r

e/registrypacketo
 n B R R T S : h|t|t|p|:|/|d|n|r| .|W|i| .|G|0|V|/|b|0|t|W|/|D|0|W|n|1|0|a|d|B|1|0|b|F|1|1|e|

-|d|0|?|d|0|c|s|e|d|N|0|=|3|4|4|0|5| I d i d n t r e a l i z e t h а t c o n t а m i n a t e d i

n

placebuild

i n g m а t е r i a 1 d i d n • t n е е d t 0 b е р а r t 0 f h i S d 0 С u m е n t _ s 0 t h а n k S f 0 r c l a r i У

i n g t h а t • A С С 0 r d i n g t 0 t h е с 1 0 s u r е r е q u е S t r е р o r t , i n 2 0 5 а р r е v i 0 u S С 0 n S u

1 t а n t g а t h е r е d f 0 u r S h а 1 1 0 W s 0 i l S а m р 1 е S а n d h а d t h е m t е S t е d f 0 r P C В S а n d r е

р 0 r t е d t h а t n 0 n е 0 f t h е S а m р 1 е S С 0 n t а i n е d d е t е c t а b 1 е С 0 n С е n t r а t i 0 n S

S е е а t t а С h е d **,** р g • 1 8 . T h i s P C B d а t а i s n ' t i n С 1 u d е d W i t h t h е 0 t h е r d а t а n 0 r а

r е m а р S 0 f W h е r е t h е S а m р 1 е s W е r е t а k е n , e t С (u n l e S S Ι а m m i s S i n g i t) T h е y d i

d n t t е S t а n У 0 t h е r m е d i а 0 r d 0 а n У Р С В t s t i n g a f t e r 2 0 0 5 G i V е n t h е р а s t u S

е S 0 f h е b u i l d i n g **,** t h е f а c t t h а t P С В s W е r e f 0 u n d t h r 0 u g h 0 u t t h е b u i l d i n g р

а S t u S е S 0 f h е b u i 1 d i n g , a n d t h а t i t W а s t 0 b е d е V е 1 0 р е d i n t 0 а С 0 m m u n i t С е n

t е r i t S е е m S t h е У W 0 u 1 d h а V е t е S t е d m 0 r е t h 0 r 0 u g h 1 y i n t h е S 0 i l s t h е r е В u t

0 n t k n 0 W W h а t t h е p 0 1 i c е s / g u i d а n С е S а r е 0 n t h i S , i f а n У Μ r R а m а n а u S

I d

k а S , C а n о У u c 1 a r i f У t h i S а n d m У p r е v i 0 u s q u е S t i n S ? Т h а n k S , M а r i а 0 n 5 / 9

/ 2 0 1 7 1 0 : 5 5 A M E d е 1 s t e i n **,** G а r У А -D N R W r o t е :

Н e 1 1 0 Μ а r i а Α S S t а t е d i n 0 u r

g u i d а n С е 0 u r P r 0 g r а m d 0 е S n t r е g u 1 а t е i n р 1 а С е Ρ С В С 0 t а m i n а t е d b u i 1 d i

n g а t е r i а 1 I b е 1 i е V е У 0 u W е r е r е f е r r i n g t 0 0 u r g u i d а n С е W h е n У 0 u m е n t i

o n

е d t h e 2 0 1 4 M O U I f n 0 t , 0 u r g u i d а n С i s h е r е h|t|t|p|:|/|p|r|o|d|o|a|s|e|x|t| ·|d|n|r| ·|w|i|

· | 회이 \\ | - | 리비니 | 의사 | - | 라비 | | 레이어 | - | 의리니니 | 아이어 | В У К е У ? Р DOCUMENT S E Q

 \overline{N} 0 = 1 6 1 5 0 & Z $\overline{\mathbb{C}}$ Н K = 6 2 9 8 E Ρ Α r е g u 1 а t е S S u С h m а t е r i а 1 u n d е r Τ S С А Ι V е С

С

d Ρ е t е r R а m а n а u S k а S а t Ε Р Α R е g i 0 n 5 W h 0 С а n h 0 р е f u 1 1 У r S р 0 n d t 0 У u r q u е

S

t i 0 n S d i r е С t 1 У A S f а r а S а С 1 0 S u r е р а С k а g е i S С 0 n С е r n е d t 0 W h а t а r е У 0 u

r e

f е r r i n g ? Α р а С k а g е S u b m i t t е d t 0 0 u r Ρ r 0 g r а m f 0 r С 0 n t а m i n а t е d S 0 i 1 а n d 0

r

g r 0 u n d W а t е r С 1 е а n u р ? Ι f S 0 а g а i n , t h е С 0 n t а m i n а t е d i n р 1 а С е b u i 1 d i n g m

а t е r i а 1 n е е d n 0 t b е р а r t 0 f S u С h а р а С k а g е i f t h е Ρ С В С 0 n t а m i n а t i 0 n n е V е r r е

а

С h е d 0 r W а S n 0 t f 0 u n d i n а n У е n V i r 0 n m е n t а 1 m е d i а е g S i 1 0 r g r 0 u n d W а t е

Р 1 е S е 1 е t m е k n 0 W i f У 0 u h е а n У f u r t h е r q е S t i 0 n S Т h а n k S , G а r У Е

r

0 r i g i n а 1 Μ е S S а g е F r 0 m : Μ а r i а Ρ 0 W е 1 1 (M E J) [m a i l t o : m a r i a p o w e l

1<u>@ m e j o iu s l</u> s е n t Μ 0 n d а У **,** М а О У 8 , 2 0 1 7 3 : 0 6 P Μ Т 0 E d e 1 s t i n , G а r У А D N R S u b

j e С t : q u е S t i 0 n а b 0 u t Ρ С В r е m е d i а t i 0 n С 1 0 s u r е Н е 1 1 0 G r У : Ι h а V е а q u е S t

i 0 n а b 0 u t D N R / E Р A r е g s r е g а r d i n g P С В S Ι h а V е t h е D N R / E Ρ Α 0 n е С 1 е а n u р Μ 0 U f r

0 m 2 1 4 I m 1 0 0 k i n g а t Р С В d а t а 7 а r 0 С 1 0 r s) f r 0 m W 0 0 d С 0 1 u m n S а n d f 1 0 0 r

S

0 f t h е G 0 0 d m а n С е n t е r b е f 0 r е i W а S r е d е е 1 0 р d i n 2 0 0 8 S е е а t t а С h е d d а t а

F 0 r t h е f 0 0 S , t h е С 0 n S u 1 t а n t С 1 0 S u r е S u m m а r У r р 0 r t S а i d t h а t Α 1 1 i d е

n

t i f i е d Р С В С 0 n t а m i n а t е d S u r f а С е S W i t h i n t h е m а i n b u i 1 d i n g h а V е b е е n е i t h

е r С 1 е а n е d 0 r е n С а р S u 1 а t е d а n d t h е е n t i r е р 0 d u С t i 0 n f 1 0 0 r 0 f t h е m а i n b

u

i 1 d i n g а р р r 0 Х i m а t е 1 У 2 0 i n С h S • F 0 r t h е W 0 0 d С 0 1 u m n S , i t S а У S : Τ h е b 0 t t

0

m S е С t i 0 n S 0 f t h е W 0 0 d е n S u р р 0 r t С 0 1 u m n S W е r е С u t 0 f f а t а е 1 е V а t i 0 n а р р r 0

X

i m а t е 1 У 1 8 i n С h е S а b 0 V е t h е n С 0 n С r е t е f 1 0 0 r а n d r е р 1 а С е d W i t h S t е е 1 S u р

р

0 r t S R В E t h е n W а S h е d t h е r е m а i n i n g u р р е r р 0 r t i 0 n S 0 f t h W 0 0 d С 0 1 u m n S W i t

h

а С 1 е а n i n g S 0 1 u t i 0 n t 0 r е m 0 V е t h е 1 0 0 У е а r а С С u m u 1 а t i 0 0 f i n d u S t r i а 1 g r i

m е D u r i n g С 0 n S t r u С t i 0 n С 0 1 u m n S С 6 а n d D 6 W е r е е n С а S е d i n С i n d е r b 1 0 С k S

R

е t е S t i n g 0 f t h е r е m а i n i n g р 0 i 0 n S 0 f W 0 0 d С 0 1 u m n S С 8 , D 7 , D 8 а n d D 1 2 S h 0 W е

d t h а t r е S i d u а 1 Р С В С 0 n С е n t r а i 0 n S е X С е е d е d 1 m g / k g 0 n 1 У а t С 0 1 u m n D 1 2 . C

0

1 u m n D 1 2 W а S t h е r е f 0 r е W r а р р е d а n d С 0 V е r е d W i t h а n е W 1 а У е r 0 f W 0 0 d t r i m Т

h

е С 0 1 u m n S W i t h r е S i d u а 1 Р С В С 0 n t а m i n а t i 0 n W е r е 1 а b е 1 е d а S Ρ С В С 0 n t а m i n а

t

е d b е f 0 r е t h е У е r е С 0 V е r е d Т h е Р С В d а t а i S n 0 t i n t h е С 1 0 S u е р а С k а g е n 0

r i S t h е r е а n У е n t i 0 n 0 f t h е i р r е S n С е i n t h е b u i 1 d i n g i n t h е С 1 0 S u r е р а С k

а

g е u n 1 S S Ι а m m i S S i n g i t Ι s t h е r е а n У t h i n g е 1 S е t h е У h 0 u 1 d h а V е i n С 1 u

d

е d ? I m t r У i n g t 0 u n d е r S t а n d h 0 W t h i S р r 0 С е s S W 0 r k S Τ h а n k S Μ а r i а Ρ 0 W е 1 1